

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

STATE OF GEORGIA,)

Defendant.)

CIVIL ACTION FILE

NO. 1:16-CV-03088-ELR

STATE DEFENDANT’S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Appendix H and this Court’s Amended Protective Order [Doc. 118], Defendant, State of Georgia (the “State”), by and through its counsel of record submits this Motion for Leave to File Under Seal the following documents: (1) the expert report of Amy McCart, Ph.D. (“McCart Report”), and (2) a redacted version of Defendant’s Statement of Undisputed Material Facts containing direct quotes from the McCart Report. The entire McCart Report was designated as confidential by Plaintiff as it contains information protected under the Family Educations Rights and Privacy Act (“FERPA”), 20 U.S.C. § 1232(g). The McCart Report is referenced as Exhibit E in the State’s Statement of Undisputed Material Facts.

The State attached a proposed order sealing that filing herewith.

Respectfully submitted this 7th day of November, 2023.

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing
STATE DEFENDANT'S MOTION FOR LEAVE TO FILE UNDER SEAL
was prepared double-spaced in 13-point Century Schoolbook font, approved
by the Court in Local Rule 5.1(C).

/s/ *Josh Belinfante*
Josh Belinfante